

1 IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
2 CASE No. 50-2011-000246 XXXX MB  
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JESS R. SANTAMARIA,  
4  
Plaintiff,

5 -vs-

6 ANDREW F. SCHALLER,  
7 Defendant.



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DEPOSITION OF STEVEN CARRIER  
  
Wednesday, March 28, 2012  
5:12 p.m. - 5:15 p.m.  
105 S. Narcissus Avenue  
Suite 400  
West Palm Beach, Florida 33401

Reported By:  
Pamela J. Sullivan, RPR, FPR, CLR  
Signature Court Reporting, Inc.

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1 APPEARANCES:

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3 On behalf of the Plaintiff:

4 DANIEL J. BARSKY, ESQUIRE

SHUTTS & BOWEN, LLP

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10 On behalf of the Defendant:

11 CHRISTINA M. KITTERMAN, ESQUIRE

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13 954.426.9290

ckitterman@cmk-law.com

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19 WITNESS: DIRECT CROSS REDIRECT RECROSS

20 STEVEN CARRIER

21 BY MS. KITTERMAN 3

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N O E X H I B I T S M A R K E D

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P R O C E E D I N G S

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Deposition taken before Pamela J. Sullivan,  
Registered Professional Court Reporter and Notary Public  
in and for the State of Florida at Large, in the above  
cause.

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Thereupon,

STEVEN CARRIER,

having been first duly sworn or affirmed, was examined  
and testified as follows:

THE WITNESS: I do.

DIRECT EXAMINATION

BY MS. KITTERMAN:

Q. Good afternoon, Mr. Carrier. My name is  
Christina Kitterman. I represent Andrew Schaller in  
this case that's been filed against him by  
Jess Santamaria.

A. Okay.

Q. The reason that I have called you for  
deposition today is because Mr. Santamaria has listed  
you as a witness on his trial list. So I need to find  
out what you may potentially know about the underlying  
case.

A. Okay.

- 1 Q. Can you state your name for the record?
- 2 A. Steven Brian Carrier.
- 3 Q. Mr. Carrier, where do you currently work?
- 4 A. At Palm Beach County at their Vista -- for
- 5 engineering and public works at their vista offices,
- 6 which is right off of Jog and Okeechobee.
- 7 Q. Okay. Do you know Mr. Santamaria?
- 8 A. I do.
- 9 Q. How do you know him?
- 10 A. Just I know he's a commissioner of Palm Beach
- 11 County, one of the seven commissioners.
- 12 Q. Have you had any conversations with
- 13 Mr. Santamaria?
- 14 A. No.
- 15 Q. Do you know Mr. Andrew Schaller?
- 16 A. Only through watching board dates, board
- 17 agendas and dates.
- 18 Q. Have you ever met him personally?
- 19 A. No.
- 20 Q. Are you familiar with a lawsuit that was
- 21 filed by Mr. Santamaria against Mr. Schaller?
- 22 A. Only through the deposition.
- 23 Q. Only through the subpoena I sent you?
- 24 A. Yes.
- 25 Q. Okay. Has anybody talked to you about this

1 lawsuit?

2 A. Maybe just a little bit of chatter with  
3 coworkers, and my boss.

4 Q. Like what?

5 A. Tanya McConnell, just that you're being  
6 deposed at 2 o'clock and I'm being deposed at 5 o'clock  
7 and George Webb is being deposed at 3 o'clock. And that  
8 was about the extent of the conversation.

9 Q. Okay. Do you have any idea what the subject  
10 matter of this lawsuit involves?

11 A. I don't. Defamation of character maybe?  
12 That's a guess. No.

13 Q. Okay. Have you ever heard of a request for  
14 inquiry that Mr. Schaller produced with regards to  
15 Mr. Santamaria?

16 A. No, not that I recall.

17 Q. Okay. Are you aware of a felony judgment  
18 that had the name of Jesus R. Santamaria that  
19 Mr. Schaller was inquiring whether that was related to  
20 Commissioner Santamaria?

21 A. No.

22 Q. Okay. Do you know why you were listed as a  
23 witness on Mr. Santamaria's witness list?

24 A. I could guess. Not really. I mean, I work  
25 with George and Tanya. I work -- they're my bosses.

1 And I know that -- I know Mr. Schaller has complained  
2 about the MSTU process and Fargo Road just by watching  
3 board meetings and I may have been involved in a couple  
4 of meetings. That was not under my direct -- that  
5 project was not under my direct supervision or even  
6 indirect supervision. But I'm aware of that issue.

7 Q. Okay.

8 A. And I guess because I work at a fairly high  
9 level in engineering, that that's why I was deposed.

10 Q. Okay.

11 A. But fortunately or unfortunately, I don't  
12 know a whole lot about the issue.

13 Q. Yes. I don't know why you were listed  
14 either, that's why I'm just trying to get to the bottom  
15 of it.

16 A. Okay.

17 Q. This lawsuit involves solely a felony record  
18 that was included in what's called a request for inquiry  
19 that Mr. Schaller published with regard to  
20 Mr. Santamaria. So my questions are trying to revolve  
21 around whether you knew about that felony judgment or  
22 whether you knew if Mr. Schaller knew that the felony  
23 judgment did not relate to Mr. Santamaria. But you're  
24 telling me, you didn't know about the felony judgment at  
25 all?

1 A. No, ma'am.

2 Q. And you didn't know about the request for  
3 inquiry?

4 A. No.

5 Q. Okay.

6 MS. KITTERMAN: I don't have any further  
7 questions.

8 MR. BARSKY: I don't either.

9 MS. KITTERMAN: Okay. Well, that was easy.

10 (Deposition concluded at 5:16 p.m.)

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CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF PALM BEACH

I, the undersigned authority, certify that STEVEN CARRIER personally appeared before me and was duly sworn.

Dated this 29th day of March, 2012.

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Pamela J. Sullivan, RPR, FPR, CLR  
Notary Public - State of Florida  
My Commission Expires: June 10, 2014  
My Commission No.: DD 993731

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C E R T I F I C A T E

STATE OF FLORIDA  
COUNTY OF PALM BEACH

I, Pamela J. Sullivan, Registered Professional Court Reporter and Notary Public in and for the State of Florida at Large, do hereby certify that the aforementioned witness was by me first duly sworn to testify the whole truth; that I was authorized to and did report said deposition in stenotype; and that the foregoing pages are a true and correct transcription of my shorthand notes of said deposition.

I further certify that said deposition was taken at the time and place hereinabove set forth and that the taking of said deposition was commenced and completed as hereinabove set out.

I further certify that I am not attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party connected with the action, nor am I financially interested in the action.

The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.

Dated this 29th day of March, 2012.

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Pamela J. Sullivan, RPR, FPR, CLR